

EXHIBIT 3

From: Frank Cornelius
To: Pritchard, J. Scott
Cc: Jana Hartman; Mitchell West; Nadine Christian-Brittain; Rubin, Michael P.; walters@lowegrahamjones.com; Lisa Elliott; Harris, Alissa N.
Subject: RE: Wolfclan v. Pierce County (C23-5399-TSZ-SKV) - Custodians/Databases Follow up
Date: Thursday, June 20, 2024 8:09:11 AM
Attachments: [image002.png](#)

Good morning. Without waiving objections to Plaintiff's current discovery requests, please see below initial custodian/database identification.

- **Custodian(s):** Sheriff's Dept./Jail; Facilities Management; Information Technology (IT) Dept.
- **Database:** Email/Outlook boxes and MS Team Chats for Ed Troyer, Patti Jackson, Matthew Dobson, Anthony Mastendrea
- **Search terms and searches (Plt. to identify applicable Interrog./RFP):** toilet, plumbing, backflow, overflow (Plaintiff to provide any additional proposed search terms)

Please advise.

Frank Cornelius
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From: Frank Cornelius
Sent: Monday, June 17, 2024 8:17 AM
To: Pritchard, J. Scott <scott.pritchard@stoel.com>
Cc: Jana Hartman <jana.hartman@piercecountywa.gov>; Mitchell West <west@lowegrahamjones.com>; Nadine Christian-Brittain <nadine.christian-brittain@piercecountywa.gov>; Rubin, Michael P. <michael.rubin@stoel.com>; walters@lowegrahamjones.com; Lisa Elliott <lmarieroybal@gmail.com>; Harris, Alissa N. <alii.harris@stoel.com>
Subject: RE: Wolfclan v. Pierce County (C23-5399-TSZ-SKV) - Custodians/Databases Follow up

Good morning Scott. Sorry for the delay. My goal is to get information to you early this week and I will follow up by Wednesday.

Frank Cornelius

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From: Pritchard, J. Scott <scott.pritchard@stoel.com>
Sent: Monday, June 17, 2024 8:15 AM
To: Frank Cornelius <frank.cornelius@piercecountywa.gov>
Cc: Jana Hartman <jana.hartman@piercecountywa.gov>; Mitchell West <west@lowegrahamjones.com>; Nadine Christian-Brittain <nadine.christian-brittain@piercecountywa.gov>; Rubin, Michael P. <michael.rubin@stoel.com>; walters@lowegrahamjones.com; Lisa Elliott <lmarieroybal@gmail.com>; Harris, Alissa N. <ali.harris@stoel.com>
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Hi Frank,

Just checking in on your disclosure regarding custodians and databases. At our June 10th conference, you had committed to sending us something by Friday, June 14. Please let us know when we can expect it.

Thanks,

Scott

Scott Pritchard | Partner
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